



TELECOMMUNICATIONS  
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**By Electronic Delivery via <https://apps.fcc.gov/oetcf/kdb/index.cfm>**

May 23, 2014

Attn: Dr. Rashmi Doshi  
Chief, Laboratory Division  
Office of Engineering and Technology  
Federal Communications Commission  
7435 Oakland Mills Rd.  
Columbia, MD 21046

**Re:     *Comments of the Telecommunications Industry Association on Draft  
Knowledge Database Publication 594280 (Software Security and Configuration  
Control Requirements for Non-SDR Devices)***

Dear Dr. Doshi:

The Telecommunications Industry Association<sup>1</sup> ("TIA") hereby submits input to the Federal Communications Commission's ("FCC") Office of Engineering and Technology on draft Laboratory Division ("OET Labs") on its draft Knowledge Database ("KDB") Publication 594280, titled *Software Security and Configuration Control Requirements for Non-SDR Devices* ("Draft KDB 594280").<sup>2</sup> TIA appreciates the efforts of the FCC Labs to provide key guidance on important topics under the FCC's new rules in the 5 GHz band.

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<sup>1</sup> TIA is a trade association based in the Washington, DC area which represents the global information and communications technology ("ICT") manufacturer, vendor, and supplier community through policy advocacy and standards development. TIA is also accredited by the American National Standards Institute (ANSI) as a standards developer for the telecommunications sector. From a policy perspective, TIA's Technical Regulatory Policy Committee ("TRPC") serves as a consensus manufacturer partner with the FCC, telecommunications certification bodies ("TCBs") and other stakeholders towards streamlining and clarifying the mechanisms of equipment certification processes and procedures. See <https://www.tiaonline.org/policy>.

<sup>2</sup> See Office of Engineering and Tech., FCC, Draft Laboratory Division Publications Report, Electronic Labelling Guidance, Publication 594280 (May 9, 2014), available at <https://apps.fcc.gov/eas/comments/GetPublishedDocument.html?id=369&tn=716718>.

TIA notes that its comments on this draft are limited to the proposed changes related to software upload security. TIA supports these changes and commends the use of an approach that is harmonized with FCC Lab guidance on software defined radios.

Additionally, we urge that important information related to the prevention of modifications to ensure that the devices operate as authorized provided in an application for equipment authorization under this KDB should be kept confidential by the FCC. It is important this information not be made public to reduce the potential for harmful interference to authorized users.

We respectfully request that OET Labs consider the above comments in its finalization of this KDB. Please contact us using the below information if we can be of more assistance.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Brian Scarpelli

Brian Scarpelli  
Director, Government Affairs

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